

## II. REMARKS

Claims 1-10 are currently pending in this application and stand rejected. Claims 1-2 and 7-8 are amended to recite that the hour is displayed in numerical form. This amendment is supported by the Specification by Figs. 1A-1C. Accordingly, there is no issue of new matter.

## III. REJECTIONS UNDER 35 U.S.C. § 103 OVER LEGGIO

Claims 1-10 stand rejected under 35 U.S.C. § 103 on the grounds that they are obvious in view of U.S. Patent No. 6,307,813 (October 23, 2001) to Leggio ("Leggio").

Applicant respectfully requests withdrawal of the 35 U.S.C. § 103 rejection because Leggio does not teach or suggest each and every claim limitation. That is, Leggio does not teach or suggest Applicant's claim element: "*a conversion unit responsive to the digital timekeeping signal for generating on the display a digital, numerical hour*", which is recited in all of Applicant's claims.

To support obviousness, a reference must suggest to one of ordinary skill in the art that the claimed invention could be carried out with a reasonable likelihood of success. Both the suggestion and the expectation of success must be founded in the prior art. *In re Dow Chem. Co.*, 837 F.2d 469, 472 (Fed. Cir. 1988). It is well settled that to establish a *prima facie* case of obviousness the prior art reference must teach or suggest each and every claim limitation. *In re Napier*, 55 F.3d 610, 613, 34 USPQ2d 1782, 1784 (Fed Cir. 1995); *Ex Parte Masato Ono*, 2000 WL 33520305, \*3.

Applicant claims a timepiece comprising a conversion unit that converts a digital time signal into both a numerical and textual display, wherein the hour is displayed as a numeral. This is a great improvement over the cited art because of the difference in the way the human mind processes numbers and text. Applicant's claimed combination of text and numbers facilitates the viewer's processing of a time display.

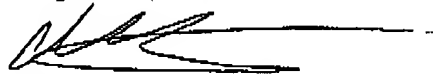
Leggio is directed to a timepiece for indicating an approximate time. Leggio, however, does not teach or suggest a timepiece capable of displaying a digital, numerical hour and a message. Leggio's timepiece cannot present such a display because Leggio fails to teach or suggest "*a conversion unit responsive to the digital timekeeping signal for generating on the display a digital, numerical hour*". At best, Leggio merely provides a text message regarding the approximate time.

In sum, Leggio does not disclose or suggest "*a conversion unit responsive to the digital timekeeping signal for generating on the display a digital, numerical hour*", as required by claims 1-10. Accordingly, Applicant respectfully requests that the § 103 rejection over Leggio be withdrawn.

#### IV. CONCLUSION

In view of the above amendments and remarks, Applicant has overcome all rejections, and reconsideration is requested. No fee is required for entry of this Reply. If any fee is due, however, please charge the required fee to deposit account number 501358. A Notice Of Appeal with fee authorization is filed herewith. Furthermore, Applicant requests that the Examiner grant a telephonic interview with the attorney of record.

Respectfully submitted,



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